

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MONDIS TECHNOLOGY LTD.,

Plaintiff,

v.

LG ELECTRONICS, INC. and
LG ELECTRONICS U.S.A., INC.,

Defendants.

Civil Case No.: 2:14-cv-00702-JRG

JURY

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Local Patent Rule 4-5(d), Plaintiff Mondis Technology Ltd. (“Mondis”) and Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively “LG”) submit this Joint Claim Construction Chart.

For reference, the U.S. patents at issue are 6,513,088 (“’088 patent”), 6,549,970 (“’970 patent”), 7,089,342 (“’342 patent”), 7,475,180 (“’180 patent”), and 6,639,588 (“’588 patent”).

The Joint Claim Construction Chart indicates the parties’ agreed constructions and the parties proposed constructions for terms in dispute.

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Respectfully submitted,

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P.R. 4-5(d) JOINT CLAIM CONSTRUCTION CHART

Claim Language¹	Claim Term or Phrase To Be Construed	Patent/Claims	Mondis's Proposed Construction	LG's Proposed Construction	Court's Construction
'088 – Claim 1 1. A display unit comprising: means for receiving video signals for video display from a video source ; memory means for storing at least display unit information , wherein the display unit information includes identifying information of the display unit; and a communication controller capable of bi-directionally communicating with the video source ; wherein the communication controller communicates the display unit information to the video source and the display unit receives a signal from the video source that is generated based on	“means for receiving video signals for video display from a video source”	'088: claim 1	[AGREED]	[AGREED]	<u>Function</u> : “receiving video signals for video display from a video source” <u>Corresponding structure</u> : “the input of video circuit 11” or “the video signal I/O terminals”
	“memory means ...”	'088: claim 1	[AGREED]	[AGREED]	“a memory”
	“display unit”	'088: claim 1 '970: claim 22 '342: claim 14 '180: claim 14	[AGREED]	[AGREED]	<i>Plain and ordinary meaning</i>
	“bi-directionally communicating”	'088: claim 1 '180: claim 14	[AGREED]	[AGREED]	<i>Plain and ordinary meaning</i>
	“identifying information of the display unit”	'088: claim 1	[AGREED]	[AGREED]	“information that can be used to identify a display from other displays”

¹ Because of the number, similarity and length of the claims, an exemplary claim is provided for each set of terms to be construed.

Claim Language ¹	Claim Term or Phrase To Be Construed	Patent/Claims	Mondis's Proposed Construction	LG's Proposed Construction	Court's Construction
at least a portion of the display unit information.	“display unit receives a signal from the video source that is generated based on at least a portion of the display unit information”	'088: claim 1	<i>Plain and ordinary meaning</i>	“a display unit receives a signal from a video source that adjusts the displayed image on the display unit”	
	“video source”	'088: claim 1 '970: claim 22 '342: claim 14	<i>Plain and ordinary meaning</i>	“computer that provides the video signal to the display”	
'088 – Claim 3 3. A display unit according to claim 1, wherein the identifying information includes an identification number for uniquely identifying the display unit	“ identification number for uniquely identifying the display unit ”	'088: claim 3 '970: claim 22	“a number for identifying a specific display unit from among other display units”	“a number that identifies one display from all other displays”	
'088 – Claim 4 4. A display unit according to claim 3, wherein the display unit information includes information that identifies a function of the display unit.	“ information that identifies a function of the display unit ”	'088: claim 4	<i>Plain and ordinary meaning</i>	<i>This term is indefinite</i>	

<p>'342 – Claim 14</p> <p>14. A method for a display unit displaying video signals sent by a video source, the method comprising the step of:</p> <p>communicating display unit information stored in a memory of the display unit to the video source via a bi-directional communication link, wherein the display unit information which is stored in the memory and is communicated to the video source includes an identification number for identifying the display unit.</p>	<p>“identification number for identifying the display unit”</p>	<p>'342: claim 14</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>“a number that can be used to identify a display from other displays”</p>
	<p>“a bidirectional communications link”</p>	<p>'342: claim 14</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p><i>Plain and ordinary meaning</i></p>
	<p>“communicating” and “communicated”</p>	<p>'970: claim 22 '342: claim 14</p>	<p><i>Plain and ordinary meaning</i></p>	<p>“display unit information stored in a memory of the display unit is imparted to the video source”</p>	
<p>'342 – Claim 15</p> <p>15. A method according to claim 14, wherein the display unit information which is stored in the memory further includes information other than the identification number.</p>	<p>“information other than the identification number”</p>	<p>'342: claim 15</p>	<p><i>Plain and ordinary meaning</i></p>	<p><i>This term is indefinite</i></p>	

<p>'970 – Claim 22</p> <p>22. A method of communicating between a display unit and a video source from which video signals are sent to the display unit for display, the method comprising the steps of:</p> <p>communicating display unit information stored in a memory of the display unit from the display unit to the video source, wherein said display unit information includes an identification number for uniquely identifying the display unit; and</p> <p>sending a signal from the video source to the display unit, wherein said signal is generated based on the display unit information, wherein information is bi-directionally communicated with the video source and the display unit.</p>	<p>“information is bi-directionally communicated with the video source and the display unit”</p>	<p>'970: claim 22</p>	<p><i>Plain and ordinary meaning</i></p>	<p>“information from the display unit is imparted to the video source and information from the video source is imparted to the display unit”</p>	
	<p>“sending a signal from the video source to the display unit, wherein said signal is generated based on the display unit information”</p>	<p>'970: claim 22</p>	<p><i>Plain and ordinary meaning</i></p>	<p>“a signal that adjusts the displayed image on the display unit is sent form the video source to the display unit”</p>	
	<p>“identification number for uniquely identifying the display unit”</p>	<p>'088: claim 3 '970: claim 22</p>	<p>“a number for identifying a specific display unit from among other display units”</p>	<p>“a number that identifies one display from all other displays”</p>	

<p>'588 – Claim 1</p> <p>1. A display apparatus which displays an image based on a video signal, comprising:</p> <p>a memory which stores data regarding said display apparatus;</p> <p>a receiver connected to said memory and an interface, said receiver receives a control signal from an external computer via said interface, wherein said control signal includes an instruction for reading out said data from said memory and is generated based on software for operating said external computer, said external computer being separate from said display apparatus; and</p> <p>a transmitter connected to said interface, said transmitter transmits an acknowledge signal to acknowledge receiving said control signal at said receiver to said external computer;</p> <p>wherein said display apparatus displays an image based on a video signal received from said external computer via said interface.</p>	<p>“A display apparatus which displays an image based on a video signal, comprising”</p>	'588: claim 1	<i>Preamble is a limitation</i>	<i>The preamble is non-limiting</i>	
	<p>“control signal”</p>	'588: claim 1	<p><i>Plain and ordinary meaning</i></p> <p>Alternatively, “a message or information, to operate or regulate, conveyed over a communication system”</p>	<p>“a signal for adjusting an image displayed on the display unit”</p>	
	<p>“data regarding said display apparatus”</p>	'588: claim 1	<i>Plain and ordinary meaning</i>	<p>“data for adjusting the displayed picture of the display unit”</p>	
	<p>“external computer”</p>	'588: claim 1	Adds patentable weight by functionally defining requirements of the receiver element	<i>This term is not entitled to patentable weight</i>	
	<p>“display apparatus”</p>	'588: claim 1	[AGREED]	[AGREED]	<i>Plain and ordinary meaning</i>
	<p>“software for operating said external computer”</p>	'588: claim 1	[AGREED]	[AGREED]	<i>Not entitled to patentable weight</i>

<p>'180 – Claim 14</p> <p>14. A display unit for displaying an image based on video signals inputted from an externally connected video source, comprising:</p> <p>a video circuit adapted to display an image based on the video signals sent by the externally connected video source;</p> <p>a memory in which at least display unit information is stored, said display unit information including an identification number for identifying at least a type of said display unit and characteristic information of said display unit; and</p> <p>a communication controller capable of bi-directionally communicating with said video source;</p> <p>wherein said communication controller is capable of communicating said display unit information other than said characteristic information to said video source.</p>	<p>“A display unit for displaying an image based on video signals inputted from an externally connected video source, comprising”</p>	'180: claim 14	<i>Preamble is a limitation</i>	<i>The preamble is non-limiting</i>	
	<p>“display unit information”</p>	All asserted claims of '088 Patent family	<i>Plain and ordinary meaning</i>	“information for adjusting a display image on the display unit”	
	<p>“display unit information including an identification number for identifying at least a type of said display unit and characteristic information of said display unit”</p>	'180: claim 14	<i>Plain and ordinary meaning</i>	<i>This term is indefinite</i>	
	<p>“display unit information other than said characteristic information”</p>	'180: claim 14	<i>Plain and ordinary meaning</i>	“display unit information excluding said characteristic information”	

<p>'180 – Claim 16</p> <p>The display unit according to claim 14, wherein said display unit receives a signal from said video source that is generated by using said identification number stored in said memory.</p>	<p>“said display unit receives a signal from said video source that is generated by using said identification number”</p>	<p>'180: claim 16</p>	<p><i>Plain and ordinary meaning</i></p>	<p>“said display unit receives a signal that adjusts the displayed image on the display unit”</p>	
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this JOINT CLAIM CONSTRUCTION CHART was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on this 24th day of June, 2015.

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